

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,
Plaintiff

v.

SHANNON CARROL KUCHLER,
Defendant

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Criminal No.: SA-20-CR-0285-JKP

Government's Sentencing Memorandum

TO THE HONORABLE JASON KENNETH PULLIAM, UNITED STATES DISTRICT JUDGE:

The United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, submits this Sentencing Memorandum in the above referenced case. Shannon Carrol Kuchler plead guilty to Count One of the Indictment, which charged the Defendant with Transportation of a Minor to Engage in Criminal Sexual Activity, in violation of 18 U.S.C. § 2423. The statute mandates a minimum term of imprisonment of 10 years. The Presentence Investigation Report establishes Kuchler's total offense level of 31, with a Criminal History Category I, resulting in an advisory sentencing guideline range of 120 to 135 months.

The Sentencing Guidelines are Properly Calculated

Neither party has filed objections to the calculation of the sentencing guidelines.

Additional Statutory Sentencing Provisions

In addition to a term of imprisonment between the mandatory minimum term of 120 months and life, the defendant's sentence must include the following statutory provisions.

1. Supervised Release – mandatory minimum of 5 years to life. The Government requests a 10-year term of supervised release which includes, in addition to the standard terms

and conditions, the recommended special conditions articulated in the presentence investigation report.

2. Restitution in the agreed amount of \$3,000.00 to the victim E.N.
3. Mandatory Special Assessment of \$100.00 pursuant to 18 U.S.C. § 3013.
4. Mandatory Special Assessment of \$5,000.00 pursuant to 18 U.S.C. § 3014.
5. Sex Offender Registration.

CONCLUSION

The Government contends a guideline sentence is appropriate.

Respectfully submitted,

ASHLEY C. HOFF
United States Attorney

By: /s/
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CERTIFICATE OF SERVICE

I certify that on October 8, 2021, a copy of the foregoing was served electronically on the attorney of record in this case via the CM/ECF system for the United States District Clerk for the Western District of Texas.

/s/
BETTINA J. RICHARDSON
Assistant U.S. Attorney